

Darryl L. Jones, Esq.  
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Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF ALASKA

Sally C. Purser,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
Josef F. Boehm, et.al.	)	
	)	
Defendants.	)	
	)	Case No. A05-0085 (JKS)

STATE OF ALASKA	)	
	)ss.	
THIRD JUDICIAL DISTRICT	)	

**AFFIDAVIT OF COUNSEL**

I, Darryl L. Jones, declare as follows:

1. I am the attorney for Sally C. Purser in this matter and have knowledge of the facts stated herein;
2. On January 22, 2007, Defendant Boehm's counsel, Brett Greenfield, faxed a letter to my Law Firm requesting my client to answer his client's second set of discovery requests, stating my client did not answer said request in the appropriate manner and had 'breached her duties'

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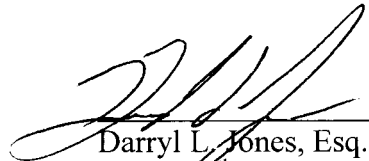
under Federal Rules of Civil Procedure. Additionally, Attorney Greenfield demanded less than a twenty-four hour 'turn around' to update what he felt were incomplete responses to discovery. Attorney Greenfield is demanding additional responses to Discovery he has previously stated to this Court he has never received. The original letter was received in my Law Office on January 26, 2007;

3. I responded to Attorney Greenfield the same day and sent letter via certified mail, return receipt requested. This letter states that my client's responses appear complete and requests Attorney Greenfield to specify exactly which responses he felt were inadequate and to what degree. This would enable my client to perhaps clarify her response(s);

4. In the same letter, I once again placed Attorney Greenfield on notice that his client has never properly responded to my client's Second or Third Set of Discovery Requests nor has his client produced discovery of any sort – ever – despite obvious repeated requests. Mr. Boehm is apparently providing discovery through his pleadings to this Court, thus has the discovery requested and continues to refuse to provide it to counsel;

5. I have been practicing law for 18 years and I bill at a rate of \$285.00 per hour. I have devoted five hours to responding to the Defendant's instant motion.

DATED this 31<sup>st</sup> day of January 2007 at Anchorage, Alaska.

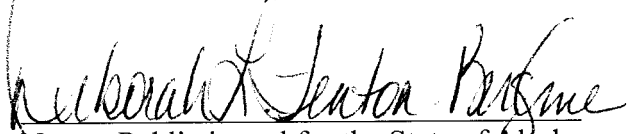


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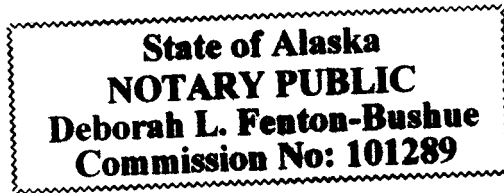
SUBSCRIBED AND SWORN to before me this 31<sup>st</sup> day of January 2007 at

Anchorage, Alaska.



Notary Public in and for the State of Alaska

My Commission Expires: 8/19/2009



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